

Exhibit E

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11 Attorneys for Defendant
FACEBOOK, INC.

12
13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**

15
16 SAMBREEL HOLDINGS LLC; YONTOO LLC;
and THEME YOUR WORLD LLC,

17 Plaintiffs,
18 vs.
19 FACEBOOK, INC.,
20 Defendant.

CASE NO. 12-CV-00668-W-KSC

**DEFENDANT FACEBOOK, INC.'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS
PROPOUNDED TO PLAINTIFF
SAMBREEL HOLDINGS LLC**

Judge: Hon. Cathy Ann Bencivengo
Hearing Date:
Hearing Time:
Dept.: Courtroom 2

23 **PROPOUNDING PARTY:** Defendant, FACEBOOK, INC.

24 **RESPONDING PARTY:** Plaintiff, SAMBREEL HOLDINGS LLC

25 **SET NO.:** ONE (1)

26
27
28 FIRST SET OF INTERROGATORIES TO
SAMBREEL HOLDINGS

Case No: 12-CV-00668-CAB-KSC

PRELIMINARY STATEMENT

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant FACEBOOK, INC. (“Defendant” or “Facebook”) hereby requests that, by May 1, 2012, plaintiff SAMBREEL HOLDINGS LLC (“Plaintiff” or “Sambreel”) respond in writing to each of the following First Set of Requests for Production of Documents, and produce all responsive documents for inspection and copying at the offices of Kirkland & Ellis LLP at 555 California Street, Suite 2700, San Francisco, California.

DEFINITIONS AND INSTRUCTIONS

1. "YOU" and "YOUR" shall refer to Sambrel, its subsidiaries, businesses, products, officers, directors, shareholders, agents, representatives, employees, attorneys, consultants, investigators, and anyone who acted or purports to act on Sambrel's behalf.

2. "DOCUMENTS" shall have the broadest meaning possible, including, but not limited to, all electronic, written or printed matter, information, COMMUNICATION, or data of any kind, including the originals and all non-identical copies thereof (whether different from the originals by reason of any interlineations, receipt stamp, indication of copies sent or received, or other notation made on such copies or otherwise) including without limitation correspondence, memoranda, e-mail, notes, opinions, compilations, chronicles, minutes, agenda, contracts, agreements, reports, summaries, inter-office and intra-office communications, notations of any sort of conversations, diaries, appointment books or calendars, teletypes, telefax, , confirmations, ESI (including information or programs stored in a computer, whether or not ever printed out or displayed including without limitation all e-mail and other electronic communications, word processing documents, presentations, calendar and relationship management data, audio or video files, online access data, databases, spreadsheets and tables, accounting application data, image files, network access and server activity logs, and backup and archival files) and all drafts, alterations, modification, changes and amendments of any of the foregoing, and all graphic or manual records or representations of any kind, including without limitation, digital images, photographs, microfiche, microfilm, videotape, records and motion pictures, and electronic, mechanical, or electric records or representations of any

1 kind including, without limitation, information on servers, hard drives, diskettes, CD-ROMs, DVDs,
2 tapes, cassettes, discs, magnetic cards and recordings. smart phones, PDAs.

3 3. “COMMUNICATION” and its plural shall mean any transmittal of information,
4 whether oral or written, including but not limited to correspondence, electronic mail (“e-mail”),
5 telexes, facsimile transmissions, telecopies, recordings in any medium of oral communication,
6 telephone and message logs, and notes or memoranda relating to any written, electronic or oral
7 communication, tweets, blogs or text messages.

8 4. “FACEBOOK PRODUCTS” shall include any of YOUR products or businesses
9 designed, created or marketed for use by Facebook users or for use in conjunction with Facebook,
10 including without limitation PageRage, Theme Your World, Paxson or Cause Layouts..

11 5. As used herein, the terms “and” and “or” shall be construed both conjunctively and
12 disjunctively, and each shall include the other whenever such construction will serve to bring within
13 the scope of these requests any information, DOCUMENTS or writings that would otherwise not be
14 brought within their scope.

15 6. As used herein, the terms “concerning” “relating to,” “reflecting,” “relate to,” “relates
16 to,” “related to,” “referring or relating to,” “referring to,” “regarding,” and “refer or relate to” mean
17 in whole or in any part alluding to, responding to, concerning, relating to, connected with, involving,
18 commenting on, in respect of, about, associated with, discussing, evidencing, showing, describing,
19 reflecting, analyzing, summarizing, memorializing, consisting of, constituting, identifying, stating,
20 tending to support, tending to discredit, referring to, or in any way touching upon.

21 7. The past tense shall include the present tense and vice versa, as necessary, to bring
22 within the scope of the discovery request all responses that might otherwise be construed to be
23 outside its scope.

24 8. Unless otherwise noted, a request for DOCUMENTS relating to something is
25 unlimited in time and covers all information relating to the subject.

26 9. This document request covers all DOCUMENTS in YOUR possession, custody, or
27 control, and includes all DOCUMENTS in your immediate possession or in the possession of your
28 attorneys or readily available to you through requests upon an agent or consultant of yours.

1 10. In producing DOCUMENTS and things, YOU are required to furnish all
2 DOCUMENTS or things in YOUR possession, custody or control, or known or available to YOU,
3 regardless of whether such DOCUMENTS or things are possessed directly by YOU or YOUR
4 predecessor, successor, parent, subsidiary, affiliate, or joint venture partner, and each of their
5 respective past and present officers, directors, shareholders, employees, agents, representatives,
6 investment bankers, accountants, attorneys, investigators, and consultants.

7 11. All DOCUMENTS should be produced in the same order as they are kept or
8 maintained by YOU in the ordinary course of business, or the DOCUMENTS should be organized
9 and labeled to correspond to the categories of the DOCUMENTS requested below.

10 12. If YOU claim any form of privilege, whether based on statute or otherwise, as a
11 ground for not producing any DOCUMENT, list all DOCUMENTS in chronological order, setting
12 forth as to each the following: 1) date; 2) author(s); 3) recipient(s); 4) description; 5) type of
13 documents; 6) subject matter; 7) basis for privilege or immunity; and 8) identity of all persons to
14 whom the document or copies were sent.

15 13. Notwithstanding the assertion of YOUR objection, any requested DOCUMENT
16 which YOU object to furnishing but which nevertheless contains non-objectionable information
17 which is responsive to this request must be produced. That portion of the DOCUMENT for which
18 the objection is asserted may, however, be redacted, provided that the above-requested identification
19 is furnished.

20 14. If any DOCUMENT in response to this request was, but no longer is, in your
21 possession, custody or control, describe each DOCUMENT and indicate the manner and
22 circumstances under which it left your possession, custody, or control and its present whereabouts, if
23 known.

24 15. If any DOCUMENT responsive to this request has been misplaced, discarded, or
25 destroyed, describe each such DOCUMENT and indicate the manner and circumstances under which
26 it was misplaced, discarded, or destroyed, if known, and its last whereabouts, if known.

27 16. These requests are deemed to be continuing in nature pursuant to Federal Rule of
28 Civil Procedure 26(e), so as to require supplementation where appropriate.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

DOCUMENTS sufficient to show the development by YOU of all FACEBOOK PRODUCTS, including, without limitation, product development plans, marketing plans, or strategic plans, both prior and subsequent to the launch of FACEBOOK PRODUCTS, including specifically but not limited to any presentations or communications regarding the foregoing to plaintiffs' senior management or Board of Directors.

REQUEST FOR PRODUCTION NO. 2:

DOCUMENTS sufficient to show the functionality, architecture, design, operation, implementation, or specifications of (a) Yontoo Platform and (b) any FACEBOOK PRODUCTS, including specifically but not limited to any presentations or communications regarding the foregoing to plaintiffs' senior management or Board of Directors.

REQUEST FOR PRODUCTION NO. 3:

DOCUMENTS sufficient to show any technical differences, changes, improvements, modification, proposed improvements, or proposed or actual new features to FACEBOOK PRODUCTS from January 1, 2008 through the present, including, without limitation, any changes made as a result of any discussions or communications with Facebook or anyone who acted or purported to act on Facebook's behalf, including specifically but not limited to any presentations or communications regarding the foregoing to plaintiffs' senior management or Board of Directors.

REQUEST FOR PRODUCTION NO. 4:

DOCUMENTS sufficient to show any technical, advertising, ad creatives, sales, marketing, customer or user presentations made by or to YOU regarding FACEBOOK PRODUCTS, including specifically but not limited to any presentations or communications regarding the foregoing to plaintiffs' senior management or Board of Directors.

REQUEST FOR PRODUCTION NO. 5:

DOCUMENTS sufficient to show any communications between YOU and any advertiser, advertising broker or seller, advertising partners (including, without limitation, Rubicon Project, AdMeld, OpenX, Advertising.com, LifeStreet, SayMedia, Microsoft Media Network, ValueClick

1 Underdox, CPX, or Neverblue) relating to FACEBOOK PRODUCTS, including, without limitation,
2 any agreement, business relationship, or financial arrangement.

3 **REQUEST FOR PRODUCTION NO. 6:**

4 DOCUMENTS from January 1, 2008 through the present, sufficient to show (a) YOUR
5 revenues, costs, gross profits, or net operating profits; (b) the breakdown in revenues, costs, gross
6 profits, or net operating profits attributable to each separate Sambrel application, business or
7 product, including without limitation, Drop down Deals, PageRage, Jeetyet Media, Cause Layouts,
8 Redford Media, OverApps, Yontoo, Buzzdock, Theme Your World, BlankBase, Paxson
9 Productions, Plural Media, ezLooker, sterky, Best Download Manager, TxtMeow, AdMatter, Free
10 TwitTube, DateHint, TopicTorch, Easyinline, Emoticrazy, Contenko, and MediaGadget; (c) the
11 breakdown in revenues, costs, gross profits, or net operating profits attributable to each internet
12 platform or website for which YOU offer users browser add-ons, including without limitation
13 Google, Google Plus, MySpace, Pinterest.com, LinkedIn, Tagged, myYearbook, Tumblr, MyLife,
14 LiveJournal, Meetup, Orkut, Microsoft Bing, Amazon, Craigslist or Badoo or (d) any direct or
15 indirect benefits to Sambrel or any Sambrel subsidiary (whether of an economic or other nature)
16 deriving from the use or provision of FACEBOOK PRODUCTS, including specifically but not
17 limited to any presentations or communications regarding the foregoing to plaintiffs' senior
18 management or Board of Directors.

19 **REQUEST FOR PRODUCTION NO. 7:**

20 DOCUMENTS sufficient to show the number of customers or users of each of YOUR
21 individual FACEBOOK PRODUCTS from January 1, 2008 through the present, including
22 specifically but not limited to any presentations or communications regarding the foregoing to
23 plaintiffs' senior management or Board of Directors.

24 **REQUEST FOR PRODUCTION NO. 8:**

25 DOCUMENTS sufficient to show the actual and projected number of user downloads and
26 installations of each of YOUR individual FACEBOOK PRODUCTS, including, without limitation,
27 DOCUMENTS sufficient to identify (a) the number of each of YOUR individual FACEBOOK
28 PRODUCTS users who downloaded or installed each such FACEBOOK PRODUCT directly from

1 one of YOUR web pages or web site operated or hosted by YOU; (b) the number of users who
2 downloaded or installed each such FACEBOOK PRODUCTS as part of a bundle with any other
3 software product; (c) the number of users who downloaded or installed one of your FACEBOOK
4 PRODUCTS from any other source; (d) the number of each of YOUR individual FACEBOOK
5 PRODUCTS users who downloaded or installed the non-advertising-supported versions of any
6 individual FACEBOOK PRODUCT; and (e) the web sites or any other sources from which users
7 download or otherwise obtain any of YOUR individual FACEBOOK PRODUCTS, including
8 specifically but not limited to any presentations or communications regarding the foregoing to
9 plaintiffs' senior management or Board of Directors.

10 **REQUEST FOR PRODUCTION NO. 9:**

11 DOCUMENTS sufficient to show the actual and projected number of FACEBOOK
12 PRODUCT users who uninstall or otherwise disable FACEBOOK PRODUCTS after downloading
13 such FACEBOOK PRODUCT, including, without limitation, DOCUMENTS sufficient to identify
14 the average amount of time between installing each such FACEBOOK PRODUCT and uninstalling
15 it for (a) FACEBOOK PRODUCT users who downloaded each such FACEBOOK PRODUCT
16 directly from one of YOUR web pages or web site operated or hosted by YOU; (b) FACEBOOK
17 PRODUCTS users who downloaded or installed a FACEBOOK PRODUCT as part of a bundle with
18 any other software product; and (c) FACEBOOK PRODUCT USERS who downloaded or installed
19 one of your FACEBOOK PRODUCTS from any other source, including specifically but not limited
20 to any presentations or communications regarding the foregoing to plaintiffs' senior management or
21 Board of Directors.

22 **REQUEST FOR PRODUCTION NO. 10:**

23 DOCUMENTS sufficient to show all data that YOU retrieved, downloaded, or otherwise
24 obtained from FACEBOOK PRODUCT users, including, but not limited to any electronically stored
25 information of any kind.

1 **REQUEST FOR PRODUCTION NO. 11:**

2 DOCUMENTS sufficient to show any attempts or efforts by YOU, whether successful or
3 not, to circumvent, bypass, or otherwise overcome any technical- or code-based barriers or other
4 measures designed to block www.pageage.com.

5 **REQUEST FOR PRODUCTION NO. 12:**

6 All COMMUNICATIONS between YOU and any past, current, or prospective FACEBOOK
7 PRODUCT users concerning any FACEBOOK PRODUCTS, including, without limitation, any
8 comments, complaints, inquiries, or feedback.

9 **REQUEST FOR PRODUCTION NO. 13:**

10 DOCUMENTS to, from, copying, or concerning the following individuals relating to
11 Facebook or any FACEBOOK PRODUCTS, or YOUR interface with any FACEBOOK PRODUCT,
12 or any advertising in connection with any FACEBOOK PRODUCT: (a) Arie Trouw; (b) Markus
13 Levin; (c) Brad Miller; (d) Andrew Sullivan; (e) John Arana, or (f) Kai Hankinson.

14 **REQUEST FOR PRODUCTION NO. 14:**

15 All COMMUNICATIONS between YOU and Facebook, including, without limitation, any
16 Facebook employee, agent, representative, attorney, or anyone who acted or purports to act on
17 Facebook's behalf.

18 **REQUEST FOR PRODUCTION NO. 15:**

19 DOCUMENTS identified in YOUR response to any interrogatories in this case.

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1 DATED: March 28, 2012

Respectfully submitted,
KIRKLAND & ELLIS LLP

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FACEBOOK, INC.

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13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**

15
16 SAMBREEL HOLDINGS LLC; YONTOO LLC;
and THEME YOUR WORLD LLC,

17 Plaintiffs,
18 vs.
19 FACEBOOK, INC.,
20 Defendant.

CASE NO. 12-CV-00668-CAB-KSC

21 **DEFENDANT FACEBOOK, INC.'S
FIRST SET OF INTERROGATORIES
PROPOUNDED TO PLAINTIFF
SAMBREEL HOLDINGS LLC**

22 Judge: Hon. Cathy Ann Bencivengo
Hearing Date:
Hearing Time:
Dept.: Courtroom 2

23 **PROPOUNDING PARTY:** Defendant, FACEBOOK, INC.

24 **RESPONDING PARTY:** Plaintiff, SAMBREEL HOLDINGS LLC

25 **SET NO.:** ONE (1)

26
27
28 FIRST SET OF INTERROGATORIES TO
SAMBREEL HOLDINGS

Case No: 12-CV-00668-CAB-KSC

PRELIMINARY STATEMENT

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, defendant FACEBOOK, INC. (“Defendant” or “Facebook”) hereby propounds this First Set of Interrogatories to plaintiff SAMBREEL HOLDINGS LLC (“Plaintiff” or “Sambreel”) and requests that each interrogatory be answered separately, fully, in writing, and under oath, in accordance with the Definitions and Instructions that precede the interrogatories below, by May 1, 2012.

DEFINITIONS AND INSTRUCTIONS

1. "YOU" and "YOUR" shall refer to Sambreel, its officers, directors, shareholders, agents, representatives, employees, attorneys, consultants, investigators, and anyone who acted or purports to act on Sambreel's behalf.

2. "DOCUMENTS" shall have the broadest meaning possible, including, but not limited to, all electronic, written or printed matter, information, COMMUNICATION, or data of any kind, including the originals and all non-identical copies thereof (whether different from the originals by reason of any interlineations, receipt stamp, indication of copies sent or received, or other notation made on such copies or otherwise) including without limitation correspondence, memoranda, e-mail, notes, opinions, compilations, chronicles, minutes, agenda, contracts, agreements, reports, summaries, inter-office and intra-office communications, notations of any sort of conversations, diaries, appointment books or calendars, teletypes, telefax, , confirmations, ESI (including information or programs stored in a computer, whether or not ever printed out or displayed including without limitation all e-mail and other electronic communications, word processing documents, presentations, calendar and relationship management data, audio or video files, online access data, databases, spreadsheets and tables, accounting application data, image files, network access and server activity logs, and backup and archival files) and all drafts, alterations, modification, changes and amendments of any of the foregoing, and all graphic or manual records or representations of any kind, including without limitation, digital images, photographs, microfiche, microfilm, videotape, records and motion pictures, and electronic, mechanical, or electric records or representations of any kind including, without limitation, information on servers, hard drives, diskettes, CD-ROMs, DVDs, tapes, cassettes, discs, magnetic cards and recordings, smart phones, PDAs.

1 3. "COMMUNICATION" and its plural shall mean any transmittal of information,
2 whether oral or written, including but not limited to correspondence, electronic mail ("e-mail"),
3 telexes, facsimile transmissions, telecopies, recordings in any medium of oral communication,
4 telephone and message logs, and notes or memoranda relating to any written, electronic or oral
5 communication, tweets, blogs or text messages.

6 4. "PERSON" means an individual, proprietorship, partnership, firm, corporation,
7 association, governmental agency, or other organization or entity.

8 5. "IDENTIFY," "IDENTIFYING," or "IDENTIFICATION" mean and require you to
9 state:

10 a) With respect to a PERSON, his or her name, address, telephone number,
11 employer, and job title, or if unknown, the PERSON'S last known address, telephone number,
12 employer, and job title;

13 b) With respect to an entity, the entity's full name, state of incorporation, current
14 or last known business address, and current or last known telephone number;

15 c) With respect to a DOCUMENT, the DOCUMENT's date of creation,
16 author(s), recipient(s), signatory/ies, addressee(s), nature, substance, and/or any other means of
17 identifying the document with sufficient particularity. DOCUMENTS to be "identified" include
18 DOCUMENTS in Sambrell's possession, custody or control, documents known by Sambrell to
19 have existed, but that no longer exist, and other documents of which Sambrell has knowledge or
20 information;

21 d) With respect to conversations and written or oral COMMUNICATION, the
22 conversation's or COMMUNICATION's date of occurrence, location of occurrence, participants,
23 substance, and the identity of every person present when the conversation or COMMUNICATION
24 occurred.

25 6. As used herein, the terms "and" and "or" shall be construed both conjunctively and
26 disjunctively, and each shall include the other whenever such construction will serve to bring within
27 the scope of these requests any information, DOCUMENTS or writings that would otherwise not be
28 brought within their scope.

1 7. As used herein, the terms "concerning" "relating to," "reflecting," "relate to," "relates
 2 to," "related to," "referring or relating to," "referring to," "regarding," and "refer or relate to" mean
 3 in whole or in any part alluding to, responding to, concerning, relating to, connected with, involving,
 4 commenting on, in respect of, about, associated with, discussing, evidencing, showing, describing,
 5 reflecting, analyzing, summarizing, memorializing, consisting of, constituting, identifying, stating,
 6 tending to support, tending to discredit, referring to, or in any way touching upon.

7 8. The past tense shall include the present tense and vice versa, as necessary, to bring
 8 within the scope of the discovery request all responses that might otherwise be construed to be
 9 outside its scope.

10 9. Unless otherwise noted, all interrogatories are unlimited in time and cover all
 11 information relating to the subject.

12 10. In producing DOCUMENTS and things, YOU are required to furnish all
 13 DOCUMENTS or things in YOUR possession, custody or control, or known or available to YOU,
 14 regardless of whether such DOCUMENTS or things are possessed directly by YOU or YOUR
 15 predecessor, successor, parent, subsidiary, affiliate, or joint venture partner, and each of their
 16 respective past and present officers, directors, shareholders, employees, agents, representatives,
 17 investment bankers, accountants, attorneys, investigators, and consultants.

18 11. If YOU claim any form of privilege, whether based on statute or otherwise, as a
 19 ground for not responding to any interrogatory, provide the following information:

20 a) the basis for the objection sufficient to establish the privilege or doctrine you
 21 assert;

22 b) a brief identification and description of the withheld information or matter to
 23 the extent that it can be done without violating such privilege or doctrine;

24 c) the identity of an individual, other than your attorneys, having knowledge of
 25 the factual basis asserted for the privilege or doctrine.

26 12. If YOU object to any portion of an interrogatory, provide all information responsive
 27 to any portion of the interrogatory to which YOU do not object.

13. If YOU object that a term or phrase is vague, ambiguous, or indefinite, then provide YOUR understanding of the term or phrase and respond accordingly.

14. If YOU object to an interrogatory on the ground that it is too broad, provide all information responsive to any portions of the interrogatory that YOU concede is relevant or reasonably calculated to lead to the discovery of admissible evidence.

15. These requests are deemed to be continuing in nature pursuant to Federal Rule of Civil Procedure 26(e), so as to require supplementation where appropriate.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify any and all Facebook user accounts created or used by any of YOUR directors, officers, employees, or agents, including, without limitation, any Facebook accounts used for “testing” of any FACEBOOK PRODUCT.

INTERROGATORY NO. 2:

State the irreparable harm suffered that YOU have suffered, including any stated measure of damages, resulting from the conduct alleged in the Complaint.

INTERROGATORY NO. 3:

State the number of PageRage users YOU contend Sambrell lost because of the conduct alleged in the Complaint, provide all bases for that contention, and IDENTIFY all documents relating thereto.

INTERROGATORY NO. 4:

IDENTIFY each person or entity YOU contend has ceased purchasing advertising from Sambrell because of the conduct alleged in the Complaint, provide all bases for that contention, and IDENTIFY all documents relating thereto.

INTERROGATORY NO. 5:

IDENTIFY all facts, witnesses, and documents relating to the allegations in the Complaint that Facebook's alleged conduct has caused, or will cause, Sambreel irreparable harm.

1 **INTERROGATORY NO. 6:**

2 IDENTIFY all facts, witnesses, and documents relating to the allegations in the Complaint
3 that Facebook organized a group boycott of Sambrell.

4 **INTERROGATORY NO. 7:**

5 IDENTIFY all facts, witnesses, and documents relating to the allegations in the Complaint
6 that Facebook “gated” Facebook users who had downloaded any FACEBOOK PRODUCT.

7 **INTERROGATORY NO. 8:**

8 IDENTIFY all facts, witnesses, and documents relating to the allegations in the Complaint
9 that that the three relevant product markets are: (i) the market for social networking services, (ii) the
10 market for products that allow users to customize or enhance social networking websites, and (iii)
11 the market for online display advertising, including the submarket for display advertising to social
12 media users.

13 **INTERROGATORY NO. 9:**

14 IDENTIFY all documents and things concerning the allegations and claims in the Complaint
15 or facts asserted in the Motion for a Preliminary Injunction and supporting papers.

16 **INTERROGATORY NO. 10:**

17 IDENTIFY all PERSONS with knowledge about the allegations in the Complaint and facts
18 asserted in the Motion for a Preliminary Injunction and supporting papers.

19 **INTERROGATORY NO. 11:**

20 IDENTIFY all witnesses who may testify at the preliminary injunction hearing currently
21 scheduled for April 25, 2012 at 3:30pm, and the dates that each witness is available for deposition
22 from May 8, 2012 through May 22, 2012.

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1 DATED: March 28, 2012

Respectfully submitted,
KIRKLAND & ELLIS LLP

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FACEBOOK, INC.

13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**

16 SAMBREEL HOLDINGS LLC; YONTOO LLC;
and THEME YOUR WORLD LLC,

17 Plaintiffs,

18 vs.
19 FACEBOOK, INC.,

20 Defendant.

CASE NO. 12-CV-00668-CAB-KSC

**DEFENDANT FACEBOOK, INC.'S
NOTICE OF DEPOSITION OF
MARKUS LEVIN**

22 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

23 **PLEASE TAKE NOTICE** that pursuant to Rules 26 and 30 of the Federal Rules of Civil
24 Procedure, Defendant Facebook, Inc shall take the deposition of Markus Levin the offices of Cooley
25 LLP 4401 Eastgate Mall San Diego, California 92121 commencing at 10:00 a.m., on Monday May
26 14, 2012, or at such other time and location as mutually agreed upon by counsel. The deposition
27 will be conducted before an officer or other person authorized to administer oaths pursuant to Rule
28 28 of the Federal Rules of Civil Procedure, and the testimony will be recorded by stenographic and

1 videographic means. The deposition will continue from day to day, excluding Saturdays, Sundays,
2 and holidays until completed, unless continued to a different date by agreement of counsel, court
3 order, or by notice of the party taking the deposition. The deposition may be stenographically
4 recorded by means of a machine using instantaneous or real time transcription and instant visual
5 display of testimony.

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DATED: March 28, 2012

s/ James F. Basile

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14 Attorneys for Defendant
15 Facebook, Inc.

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11 Attorneys for Defendant
FACEBOOK, INC.
12

13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**

15
16 SAMBREEL HOLDINGS LLC; YONTOO LLC;
and THEME YOUR WORLD LLC,
17
18 Plaintiffs,
vs.
19 FACEBOOK, INC.,
20
21 Defendant.

CASE NO. 12-CV-00668-CAB-KSC

**DEFENDANT FACEBOOK, INC.'S
NOTICE OF DEPOSITION OF BRAD
MILLER**

22 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

23 **PLEASE TAKE NOTICE** that pursuant to Rules 26 and 30 of the Federal Rules of Civil
24 Procedure, Defendant Facebook, Inc shall take the deposition of Brad Miller the offices of Cooley
25 LLP 4401 Eastgate Mall San Diego, California 92121 commencing at 10:00 a.m., on Wednesday
26 May 16, 2012, or at such other time and location as mutually agreed upon by counsel. The
27 deposition will be conducted before an officer or other person authorized to administer oaths
28 pursuant to Rule 28 of the Federal Rules of Civil Procedure, and the testimony will be recorded by

1 stenographic and videographic means. The deposition will continue from day to day, excluding
2 Saturdays, Sundays, and holidays until completed, unless continued to a different date by agreement
3 of counsel, court order, or by notice of the party taking the deposition. The deposition may be
4 stenographically recorded by means of a machine using instantaneous or real time transcription and
5 instant visual display of testimony.

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DATED: March 28, 2012

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11 Elizabeth L. Deeley
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11 Attorneys for Defendant
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12
13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**

15
16 SAMBREEL HOLDINGS LLC; YONTOO LLC;
and THEME YOUR WORLD LLC,

17 Plaintiffs,

18 vs.
19 FACEBOOK, INC.,

20 Defendant.

21 CASE NO. 12-CV-00668-CAB-KSC

22 **DEFENDANT FACEBOOK, INC.'S**
NOTICE OF DEPOSITION OF
ANDREW SULLIVAN

23 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

24 **PLEASE TAKE NOTICE** that pursuant to Rules 26 and 30 of the Federal Rules of Civil
Procedure, Defendant Facebook, Inc shall take the deposition of Andrew Sullivan the offices of
25 Cooley LLP 4401 Eastgate Mall San Diego, California 92121 commencing at 10:00 a.m., on Friday
26 May 18, 2012, or at such other time and location as mutually agreed upon by counsel. The
27 deposition will be conducted before an officer or other person authorized to administer oaths
28 pursuant to Rule 28 of the Federal Rules of Civil Procedure, and the testimony will be recorded by

1 stenographic and videographic means. The deposition will continue from day to day, excluding
2 Saturdays, Sundays, and holidays until completed, unless continued to a different date by agreement
3 of counsel, court order, or by notice of the party taking the deposition. The deposition may be
4 stenographically recorded by means of a machine using instantaneous or real time transcription and
5 instant visual display of testimony.

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DATED: March 28, 2012

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14 Attorneys for Defendant
15 Facebook, Inc.

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13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**

15
16 SAMBREEL HOLDINGS LLC; YONTOO LLC;
and THEME YOUR WORLD LLC,

17 Plaintiffs,

18 vs.

19 FACEBOOK, INC.,

20 Defendant.

21 CASE NO. 12-CV-00668-CAB-KSC

22 **DEFENDANT FACEBOOK, INC.'S
NOTICE OF DEPOSITION OF ARIE
TROUW**

23 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

24 **PLEASE TAKE NOTICE** that pursuant to Rules 26 and 30 of the Federal Rules of Civil
Procedure, Defendant Facebook, Inc shall take the deposition of Arie Trouw the offices of Cooley
25 LLP 4401 Eastgate Mall San Diego, California 92121 commencing at 10:00 a.m., on Thursday May
26 10, 2012, or at such other time and location as mutually agreed upon by counsel. The deposition
27 will be conducted before an officer or other person authorized to administer oaths pursuant to Rule
28 of the Federal Rules of Civil Procedure, and the testimony will be recorded by stenographic and

1 videographic means. The deposition will continue from day to day, excluding Saturdays, Sundays,
2 and holidays until completed, unless continued to a different date by agreement of counsel, court
3 order, or by notice of the party taking the deposition. The deposition may be stenographically
4 recorded by means of a machine using instantaneous or real time transcription and instant visual
5 display of testimony.

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DATED: March 28, 2012

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14 Attorneys for Defendant
15 Facebook, Inc.

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